



February 29, 2008  
*Via ECFS Transmission*

2600 Maitland Center Pkwy.  
Suite 300  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL  
32790-0200  
Tel: 407-740-8575  
Fax: 407-740-0613  
www.tminc.com

Marlene H. Dortch, Commission Secretary  
Office of the Secretary  
Federal Communications Commission  
445 -- 12<sup>th</sup> Street, SW -- Suite TW-A325  
Washington, D.C. 20554

**RE: EB Docket No. 06-36 CPNI Certification for  
Communication Technology, Inc.**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 29, 2008, and pursuant to 47 C.F.R. § 64.2009(e), Communication Technology, Inc. hereby files its Certification of Customer Proprietary Network information (CPNI) for the year 2007 and supporting Statement. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or sthomas@tminc.com if you have any questions about this filing.

Sincerely,

Sharon Thomas  
Consultant to  
Communication Technology, Inc.

*ST/im.*  
*Enclosure*

Copy: Enforcement Bureau (*provided via ECFS website*)

Best Copy and Printing (*FCC@BCPIWEB.COM*)

TMS: FCX0801

File: Communication Technology, Inc. -- FCC Certs / Orders

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Name of company covered by this certification: **Communication Technology, Inc.**

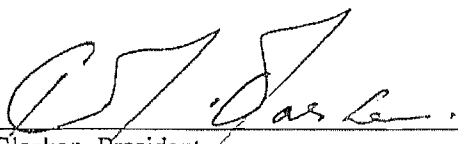
Form 499 Filer ID: 822440

Name of signatory: Ruddy McGlashan

Title of signatory: President

I, Ruddy McGlashan, certify and state that:

1. I am the President of **Communication Technology, Inc.** and, acting as an agent of the company, I have personal knowledge of **Communication Technology, Inc.**'s operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, **Communication Technology, Inc.**'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

  
\_\_\_\_\_  
Ruddy McGlashan, President

FEB 27 2008  
\_\_\_\_\_  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

## **Communication Technology, Inc.**

### **Statement of CPNI Procedures and Compliance**

Communication Technology, Inc. ("CTI" or "the Company") serves does not use or permit access to CPNI to market any telecommunications or non-telecommunications services and the Company has trained its personnel not to use CPNI for marketing purposes. Should CTI elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

CTI has in place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. Only the Company's administrative directors and supervisors have internal usernames/passwords to access customer CPNI, which is maintained on secure servers, and they are trained with respect to the requirements to safeguard CPNI. Additionally, the Company can determine which individuals within the Company have accessed this information, to ensure that improper access does not occur.

CTI maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Company does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

CTI has instituted procedures to safeguard the disclosure of CPNI on-line. The Company currently serves only business customers, who complete an online questionnaire when they initiate service and create a username and password. Passwords created on or after December 8, 2007, do not employ readily available biographical information or account information. Unless the appropriate password is provided when the customer attempts to access their account records, on-line access to CPNI is denied.

CTI currently does not offer a back-up authentication method for lost or forgotten passwords.

The Company immediately notifies a customer whenever a password, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information.

CTI does not have any retail locations and therefore does not disclose CPNI in-store.

CTI has procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. The Company maintains records of all breaches discovered and notifications made to the USSS and the FBI, and to customers .

CTI has not taken any actions against data brokers in the last year.

CTI did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2007.

CTI has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.